

**LONDON BOROUGH OF
CROYDON
PENSION FUND
COMMUNICATIONS POLICY
STATEMENT**

**Policy Agreed : March 2024
Review Due: March 2025**

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Section 1

Legislative background

This document sets out the Communications Policy (Policy) of the London Borough of Croydon, acting in its capacity as Administering Authority of the London Borough of Croydon Pension Fund (Administering Authority) as required under Regulation 61 of the Local Government Pension Scheme Regulations 2013 (the Regulations).

The Regulations require each administering authority in England and Wales to prepare, maintain and publish a statement setting out their policy on communicating with the following stakeholders and organisations involved with the Local Government Pension Scheme (Scheme):

- Contributing Scheme members
- Prospective Scheme members
- Pensioner Scheme members and dependents
- Deferred Scheme members
- Admitted and Scheduled Scheme employers participating in the Croydon Pension Fund (Fund)
- Pension Committee and other elected Members
- Pension Board
- Other bodies

Some of the Fund's other stakeholders are:

- Additional Voluntary Contributions Provider
- User Groups
- Fund Investment Managers
- Fund Investment Adviser
- Fund Governance Adviser
- Fund Actuary
- Fund Legal Advisers
- Fund Legal Comment on Reports Provider
- Fund Custodian
- Administration Software Provider
- Employer Payroll Providers
- Trade Unions/Employer Representatives
- Scheme Advisory Board
- The Pensions Regulator
- Pensions and Lifetime Savings Association (PLSA)
- Local Authority Pension Fund Forum (LAPFF)
- Local Government Association
- London CIV
- Government Actuary's Department
- Department for Levelling Up, Housing and Communities (DLUHC)

The Public Service Pensions Act 2013 introduced a framework for the governance and administration of public sector service pension schemes and provided an extended regulatory oversight of the Scheme by The Pensions Regulator (the Regulator).

Guidance

The Pension Regulator's General Code of Practice

The Regulator's General Code of Practice, which comes into force on 27 March 2024, includes a module covering "the main principles governing bodies should apply when meeting their legal obligations to communicate with members." They state:

The law details when governing bodies must communicate with their members, the information they must provide and the timescales for providing the information. These requirements range from information provided when a member joins the scheme, ongoing communications, taking benefits, and beyond. The law also sets out information that governing bodies must provide on request.

When preparing communications to members, governing bodies should:

- a. ensure that all communications sent to members are accurate, clear, concise, relevant and in plain English;*
- b. regularly review member communications, taking account of member feedback, any changes to scheme design and developments in law and this code of practice;*
- c. when deciding on the format of communications and information to be published, consider any technology that may be available to them and appropriate for their members*
- d. consider using various communication methods, including accessible online content, audio, Braille, large font, and languages other than English*
- e. consider what additional information or explanation members may need to help them make informed decisions about their benefits.*

The Scheme Advisory Board's Good Governance Review

In their Good Governance Review which was instigated to examine the effectiveness of the Scheme governance models and to draw up a list of their expectations that should apply to all LGPS schemes, the Local Government Pension Scheme Advisory Board (SAB) highlight communication as a core requirement for those managing a fund. They discuss engagement with members and employers and state their expectations as follows:

The Fund's Communication Strategy sets out how it engages with active, deferred and pensioner scheme members including:

- *The Fund maintains a website which provides general advice, information and updates including copies of all current policies;*
- *Members have secure online access to their own pension records in order to run retirement estimates;*
- *Member's annual benefit statements are available online or in writing (including large text) on request; and*
- *Scheme members are able to arrange one to one appointments, by phone or at our offices, with members of the pension team to discuss specific matters.*

The Fund carries out a range of activities that are designed to engage employers. These are set out within the Fund's Communication strategy and include:

- *An Annual Employer Forum which provides an opportunity for employers to receive an update on the performance of the Fund, provide feedback on the service and receive updates on the LGPS and related issues;*
- *The Fund engages and consults with employers during the actuarial valuation and specifically on key strategies such as the Funding Strategy Statement;*
- *A quarterly employer newsletter provides update on technical changes, process reminders and a calendar of key upcoming dates;*
- *Training sessions which can be provided on request covering the main areas of employer responsibility, for example year end returns, processing ill health cases and internal dispute resolution procedures; and*

- *The Fund is available to provide support on issues such as outsourcing services or workforce restructuring.*

Objectives, Assessment and Risks

Objectives

The aim of this Policy is to make sure that all stakeholders are kept informed of developments within the Fund and it sets out the mechanisms used to meet communication needs. The Fund aims to use the most appropriate communication methods for the audiences receiving the information. We aim to ensure transparency and believe that an effective communication process helps to maintain the efficient running of the Fund.

This Policy has a number of specific objectives relating to how we communicate with our stakeholders, including:

- Promote the Scheme as a valuable benefit and provide sufficient and up to date information so that members can make informed decisions about their benefits;
- Communicate in a plain language style;
- Ensure the Fund uses the most appropriate means of communication, taking into account the different needs of different stakeholders;
- Work with employers to help them to fulfil their responsibility to share information with members of the Scheme;
- Look for efficiencies in delivering communications including greater use of technology; and
- Evaluate the effectiveness of communications and shape future communications

How we assess whether we are meeting our objectives

Ways in which we assess whether we are meeting our objectives are:

- Via feedback / Compliments / Complaints from members on individual experience of using the Pensions service.
- Via interactions with members when dealing with enquiries

- Via feedback from employers on an individual basis and through consultation exercises.
- Via document reviews by Fund advisers.

Key Risks

The key risks to delivering this Policy are outlined below.

- Inadequate staffing or budget resources to effectively implement the Policy could affect successful delivery of the objectives;
- Limitations of IT systems and their availability could affect successful delivery of the objectives;
- Inadequate knowledge and training of staff and stakeholders could affect ability to provide or access digital information, thus limiting the effectiveness of this communication method;
- Failing to deliver information in an appropriate way for stakeholders to access / understand, e.g., too complex or simple or in an unsuitable format could lead to misunderstanding and complaints resulting in reputational damage, negative impact on the pension benefits accrued by members or failure to comply with legislative requirements;
- Failure to keep the website up to date or providing current information to stakeholders could result in Scheme members, prospective Scheme members and employers being unaware of Scheme changes or requirements which could cause a decline in membership and/or members/employers exiting the scheme early, as well as inaccuracies in member benefits.

Effective Date and Review Date

This policy was agreed by the Pension Committee at their meeting on 19 March 2024.

It will be review annually or sooner as required.

The next review will be in March 2025.

Section 2

General Communications

The Administering Authority has at its disposal a wide range of options for communicating with the diverse groups that we need to serve. The method of communication varies depending on what needs to be communicated and to whom. The methods used are detailed below.

<i>Paper-based and Electronic Means</i>
We use a range of methods to communicate including a variety of paper-based and electronic means. We will accept some communications electronically and will respond electronically where possible, being mindful that the security of data is essential. We will send all personal data via secure email unless requested not to.
<i>Website</i>
Communication in the form of a dedicated Pensions website is available via www.croydonpensionscheme.org/ . The website contains a wide range of information for not only Scheme members but also Scheme employers and other interested parties. The website contains copies of newsletters and other relevant information pertaining to the Local Government Pension Scheme (the Scheme).
<i>Policy Documents</i>
These are available for all stakeholders to access on the website. They cover a range of areas and are reviewed periodically.
<i>Annual Report and Accounts</i>
These are available for all stakeholders to access on the website. They provide details of Fund activity and data over the year that they apply to.

Data Protection Statement

To protect any personal information held on computer, the London Borough of Croydon Pension Fund is registered under the Data Protection Act 2018. This allows members to check that their details held are accurate.

The Fund may, if it chooses, pass certain details to a third party, if the third party is carrying out an administrative function of the Fund, for example, the Fund's AVC provider. Members who wish to apply to access their data on Data Protection grounds should fill in an on-line request at:

<https://www.croydon.gov.uk/council-and-elections/privacy-and-data-protection/makeinformation-request/make-subject-access-request>

National Fraud Initiative

The Administering Authority is under a duty to protect the public fund it administers, and to this end may use information for the prevention and detection of fraud. This includes our participation in the Government's National Fraud Initiative, and it may also share information with other bodies responsible for auditing or administering public funds, solely for the purposes of preventing and/or detecting fraud.

Section 3

Stakeholder- Specific Communication

In this section we detail the communications in relation to specific categories of stakeholders.

Communication with Contributing Scheme Members

<i>Member Self Service</i>
All members can request their own password to view their record. Amendments can be made to update certain details and calculations can be performed.
<i>Annual Benefit Statement</i>
Members can access their individual information via the Member Self Service facility at their convenience. The Statement details information held on the Pension database and provides estimates of the current and future value of the member's benefits.
<i>Pensions Taxation Correspondence</i>
Members who exceed the Annual Allowance (AA) will be sent a Pensions Savings Statement and an explanatory information sheet by the Pension Team on or before 6 October (this is the legal deadline) via secure email or post if no email address is on file. Information on the Lifetime Allowance (LTA) is provided to members as part of the benefit calculation process.
<i>Pensions Updates</i>
When there are Scheme changes there will be additional communications for Members. As appropriate for the members, information will be disseminated by work emails, via the intranet, via employers or through the post. If applicable details will be uploaded to the Fund website.
<i>Scheme Guides</i>
Scheme guides are available on the Fund website.
<i>Pensions Helpline</i>
Members can call the Pensions Team on one central helpline number, which is advertised on all our literature. The number is 0208 726 6000 x44034

Communication with Prospective Scheme Members

<i>Initial Contact</i>

All permanent new members of staff are automatically enrolled into the Scheme. Each new member is sent a welcome letter, statutory notice confirming membership of the Scheme along with our Scheme Guide and contact information.

Induction Seminar

Human Resources hold induction presentations for all new employees of the Council.

Pensions Helpline

Prospective members can call the Pensions Team on one central helpline number, which is advertised on all our literature. The number is 0208 726 6000 x44034

Communication with Pensioner Scheme Members and Dependents

Pensioner's Payslip

All pensioners receive payslips in March, April and May along with their P60 at the end of the year. A payslip will also be received where the amount of net pension changes by more than £20.00.

Pensioners Newsletter

All Pensioners receive an annual newsletter which is sent out in April to their home addresses. This publication includes details of the pensions increase, and other relevant information.

Life Certificates

The Fund undertakes an annual exercise through correspondence for UK pensioners over the age of 80 in order to establish that details held are up-to-date. For pensioners living outside the UK this exercise will be conducted through Western Union.

Croydon Council also participates in the National Fraud Initiative every 2 years and receives monthly mortality screening reports from NFI.

Pensions Helpline

Members can call the Pensions Team on one central helpline number, which is advertised on all our literature. The number is 0208 726 6000 x44034

Communication with Deferred Scheme Members

Annual Benefit Statement

Every year members are sent an Annual Benefit Statement to their home addresses. The Statement details information held on the Pension Team database and provides estimates of the current and future value of the member's benefits.

Update of Information

If there are any changes to the Scheme Regulations which are relevant to Deferred Scheme members, details will be sent to their home addresses. The Fund also uses a tracing agency to contact members with whom it has lost contact.

Pensions Helpline

Members can call the Pensions Team on one central helpline number, which is advertised on all our literature. The number is 0208 726 6000 x44034

Communication with Admitted and Scheduled Employers Participating in the Fund

Employer Forums

An annual remote meeting takes place between representatives of the Fund and its Scheme employers to discuss recent developments within the Scheme or pensions generally, to promote and ensure statutory compliance and to monitor and review communication strategies. It is mandatory for named acting liaison officers to attend.

Triennial Valuation Engagement Opportunities

Employers are kept informed throughout the process of the triennial valuation which is carried out by the Fund's Actuary. Employers' comments are always encouraged and welcomed and, where appropriate, taken into consideration

Administration Strategy

The Fund's Administration Strategy sets out the roles and responsibilities of the Administering Authority, the third party payroll provider and employers in the Fund and can be found on the website at:

<https://www.croydonpensionscheme.org/resources/administration-strategyseptember-2023/>

It sets out the service level agreement and targets which all are expected to meet. It includes information on manual and I-connect schedule requirements.

Communication with Pension Committee and Other Elected Members

In accordance with the Council's Constitution, the role of the Committee is to ensure that the Fund is properly operated in accordance with the Regulations, all other relevant legislation and best practice as advised by the Regulator, including financial, governance and administrative matters.

Information is provided to members of the Pension Committee to allow the Council to carry out its role as Administering Authority. Much of this information is publicly available. Details as follows:

<i>Committee Membership</i>
Details of the members of the Committee can be found on the Council's website, along with their contact details.
<i>Committee Meetings</i>
The Committee meets a minimum of four times a year or more frequently, as required. Meetings are open to members of the public, although there may be occasions when members of the public are excluded due to the confidential nature of matters under discussion.
<i>Agendas, Reports and Minutes</i>
The agenda, reports and minutes of the meeting are available on the Council's website at: https://democracy.croydon.gov.uk/mgCommitteeDetails.aspx?ID=164 Certain confidential items will not be available for public access but where this is the case, an explanation of the reason will be shown.
<i>Training</i>
The Pension Committee (and reserve members) are required to have sufficient knowledge to carry out their role effectively. A training plan covering mandatory and non-mandatory training opportunities is agreed every year by the Committee. It includes on-line training, bespoke sessions delivered by Fund advisers and external sessions provided by other bodies such as the Local Government Association (LGA) and the SAB.
<i>Fund Documents</i>
Fund documents are available to Committee members on the Fund website and the on-line training platform.
<i>Assessment of Knowledge</i>
Knowledge assessments are carried out periodically to help to address knowledge gaps through targeted training.

Communication with Pension Board

The Pension Board is an advisory body that supports the Pension Committee in carrying out its duties.

Information is provided to members of the Pension Board to allow it to carry out its role in supporting the Committee. Much of this information is publicly available. Details as follows:

<i>Board Membership</i>
Details of Board membership, background of members and terms of reference are available on the Fund's website. Enquiries for the Board should be addressed to officers in the first instance.

Board Meetings

The Board meets at least four times a year in the ordinary course of business and additional meetings may be arranged as required to facilitate its work. Meetings are open to members of the public, although there may be occasions when members of the public are excluded due to the confidential nature of matters under discussion.

Agendas, Reports and Minutes

The agenda, reports and minutes of the meeting are available on the Council's website at:

<https://democracy.croydon.gov.uk/mgCommitteeDetails.aspx?ID=163>

Certain confidential items will not be available for public access but where this is the case, an explanation of the reason will be shown.

Training

There are requirements imposed on the Board by the Regulator in terms of knowledge. A training plan covering mandatory and non-mandatory training opportunities is agreed every year. It includes on-line training, bespoke sessions delivered by Fund advisers and external sessions provided by other bodies such as the Local Government Association (LGA) and the SAB.

Fund Documents

Fund documents are available to Board members on the Fund website and the online training platform.

Assessment of Knowledge

Knowledge assessments are carried out periodically to help to address knowledge gaps through targeted training.

Communication with Other Bodies

There are a number of other interested parties with whom we communicate as required, including:

Additional Voluntary Contributions Provider

Additional Voluntary Contributions (AVCs) are a way to top up your tax-free lump sum and pension from the Local Government Pension Scheme. The Fund's AVC provider is Prudential who can be contacted via the Pension Team.

User Groups

Relevant officers attend user group meetings twice a year to discuss software issues and required upgrades with Altair who provide the Fund's administration system. They also attend groups for i-Connect and Member Self Service.

Fund Investment Managers

Regular meetings are held with managers (including London CIV) who invest on behalf of the Fund

<i>Fund Investment Adviser</i>
Regular meetings are held with the Investment Adviser who provides advice on asset allocation and investment of the Fund
<i>Fund Governance Adviser</i>
Meetings / correspondence are held with the Governance Adviser to discuss governance issues as required.
<i>Fund Actuary</i>
Periodic meetings / correspondence are held with the Fund Actuary to discuss funding levels, employers' contributions and the valuation of assets and liabilities of the Fund. A secure portal is used for uploading data for valuation purposes.
<i>Fund Legal Advisers</i>
Communication is largely via email to discuss and facilitate employer admission to the Fund as required.
<i>Fund Legal Comment on Reports Provider</i>
Communication is largely via email to obtain legal comment and sign off on Pension Committee Reports.
<i>Fund Custodian</i>
The Fund's Custodian is Bank of New York Mellon, who ensures the safekeeping of the Fund's investment transactions and all related share certificates.
<i>Trade Unions/Employer Representatives</i>
The Fund works with the relevant trade unions and employer representatives to ensure the Scheme is understood by all interested parties.
<i>Scheme Advisory Board</i>
The SAB was established following the Public Services Pensions Act 2013. It provides advice to Scheme funds and Pension Boards in relation to the effective and efficient administration and management of the Scheme. We therefore liaise with the SAB as appropriate
<i>The Pensions Regulator</i>
The Regulator publishes codes of practice and guidance, some of which are relevant to the public sector. The Regulator also oversees how pension schemes are adhering to some legal requirements. The Fund liaises with the Regulator as required to provide information relating to matters of interest to the Regulator.
<i>Pensions and Lifetime Savings Association (PLSA)</i>
The Fund is a member of PLSA, which provides an opportunity for administering authorities to discuss issues of common interest and to share best practice.
<i>Local Authority Pension Fund Forum (LAPFF)</i>
The Fund is a member of LAPFF. The LAPFF was established to help local authorities' funds to share information and ideas about socially responsible investing.

The Local Government Association (LGA)

The Fund receives updates on items relating to pensions via email. Additionally the Fund procures training for members and officers from the LGA as required via online booking.

London Pension Officers Group and London Pension Officers Forum

The Fund is a member of these voluntary groups. Meetings are held on a quarterly basis to share information and ensure standardised interpretation of Scheme regulations and best practice.

London CIV

Regular emails and monthly detailed extensive reports received from the LCIV. Additionally regular teams meetings with the Head of Pensions carried out.

Government Actuary's Department

The Fund receives updates on items relating to pensions via email

Department for Levelling Up, Housing and Communities (DLUHC)

The Fund receives updates on items relating to pensions via email

Requests for Information

Requests for information either under the Freedom of Information Act or otherwise, will be dealt with as openly and swiftly as allowed providing that such information does not breach confidentiality.

Consultations

There are occasions when the Administering Authority will consult with interested parties whether because of potential changes to the regulations governing the Scheme or specific policy changes relating to the Fund. In these instances, the most effective way of communicating with interested parties may be to hold a period of consultation, during which, they are given the opportunity to respond to specific changes. Interested parties and representative groups will be approached to provide feedback to the policy changes before amendments are enacted.

Minority Groups

It is recognised that there may be occasions when some minority groups may not be able to access all the information available to others. The Fund will try to ensure that information is available to the widest possible audience and as such will try to ensure that minority groups do have access to that information. This is however, a developing area, but feedback on how to promote better access for all minority groups is welcome.

Section 4

Availability of Fund Publications

The table below shows the availability of Fund publications along with their publication frequency and review periods.

Communication Type	Form Of Communication- Paper / Electronic / Internet or Website	When Issued / Available	When Reviewed
Local Government Pension Scheme Guide	P/E/IW	Always available	Annually
Topping up Benefits	P/E/IW	Always available	Annually
Annual Benefit Statement	P/E	Annually	Annually
Statutory Notifications	P	On Joining and Autoenrolment	Periodically
Members Self Service	P/E	On Joining or as required	Continually
Pension Updates	P/E/IW	As required	After each publication
Annual Report and Accounts	P/E/IW	Annually	Annually
Early Leaver Information	P/E/IW	With deferred benefit statement	Annually
Retirement Information	P/E/IW	With retirement details	Annually
Pension Increase Notification	P/E/IW	Annually	Annually
Newsletter	P/E/IW	Annually	Annually
Actuarial Valuation Report	P/E/IW	Triennially	Triennially
Pension Committee Reports	P/E/IW	Quarterly	Quarterly
Pension Board Reports	P/E/IW	Quarterly	Quarterly
Communications Policy	P/E/IW	Annually	Annually
Governance Compliance Statement	P/E/IW	Annually	Annually
Fund Policies and Strategies	IW	Always available	As required